

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

LETICIA LEE,

Plaintiff,

v.

WARNER MEDIA, LLC; HBO HOME
ENTERTAINMENT, INC.; WARNER BROS.
WORLDWIDE TELEVISION DISTRIBUTION
INC.; NBC UNIVERSAL TELEVISION
STUDIO DIGITAL DEVELOPMENT LLC; CBS
BROADCASTING INC.; GRAMMNET NH
PRODUCTIONS

Defendants.

Case No. 6:23-cv-06025-FPG

Removed From:

Supreme Court of the State of New
York, County of Ontario

Index No.: 134539-2022

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT AND
OPPOSITION TO MOTION TO
DISMISS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendants Warner Media, LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution Inc.; NBC Universal Television Studio Digital Development LLC; CBS Broadcasting Inc.; and Grammnet NH Productions ("Defendants") request a three-week extension of time to file their response to Plaintiff's motion for summary judgment and reply in support of Defendants' motion to dismiss, until May 11, 2023. Plaintiff LeTicia Lee has not responded to Defendants' request for Plaintiff's consent to this motion.

On April 5, 2023, Plaintiff filed a Motion for Summary Judgment and an Opposition to Defendants' Motion to Dismiss (ECF 15). Per the Court's March 7, 2023 Order, Defendants' reply is currently due April 20, 2023 (ECF 14). Defendants seek an extension of time for the following reasons. First, Plaintiff has both opposed Defendants' motion to dismiss and filed a cross-motion for summary judgment. Second, Plaintiff attached as an exhibit her allegedly infringed pilot script, which she previously did not attach to her Amended Complaint and failed to provide to Defendants

though they previously requested that she do so. Accordingly, the requested extension of time would permit Defendants additional time to adequately respond to Plaintiff's cross-motion for summary judgment and review Plaintiff's allegedly infringed script in order to sufficiently reply to Plaintiff's claims.

On April 5, 2023, Defendants' counsel called Plaintiff to request this 3-week extension, but Plaintiff did not answer.¹ That same day, Defendants' counsel also followed up via text message to Plaintiff, requesting the 3-week extension. Plaintiff did not respond.

The requested extension shall not disrupt the schedule in this case or prejudice any party. This is Defendants' first request for extension of time to file a response to Plaintiff's motion for summary judgment and reply in support of their motion to dismiss.

Accordingly, Defendants respectfully request a three-week extension of time to file a response to Plaintiff's motion for summary judgment and reply in support of their motion to dismiss, until May 11, 2023.

Dated: April 7, 2023

Respectfully submitted,

/s/ Elizabeth A. McNamara

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Universal Television Studio Digital Development
LLC; CBS Broadcasting Inc.; and Grammnet NH
Productions*

¹ Plaintiff's email address is not listed on her Amended Complaint, and she has declined to provide Defendants with that information. Accordingly, to date Defendants have only been able to reach Plaintiff via her telephone number.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2023, true and correct copies of the foregoing Motion for Extension of Time to Respond to Plaintiff's Motion for Summary Judgment and file a Reply in Support of Defendants' Motion to Dismiss and Proposed Order, filed electronically through the Court's CM/ECF system, were mailed via overnight Federal Express to Plaintiff LeTicia Lee at the following address:

LeTicia Lee
1335 Jefferson Rd #20711
Rochester, NY 14602

/s/ Elizabeth A. McNamara
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